

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL
CORPORATION,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

C.A. No. 17-151-LPS

DECLARATION OF TRAVIS S. HUNTER

I, TRAVIS S. HUNTER, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an attorney and director at the law firm of Richards, Layton & Finger, PA, which is counsel for Plaintiff and Judgment Creditor Crystallex International Corporation (“Crystallex”) in the above-captioned action.

2. I make this declaration in connection with Crystallex’s Reply Brief in Further Support of its Motion to Modify the Stay.

3. Attached hereto as Exhibit 1 is a true and correct copy of email correspondence between myself and counsel for Defendant and Judgement Debtor Bolivarian Republic of Venezuela, dated December 18-19, 2019.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on January 17, 2020, in Wilmington, Delaware

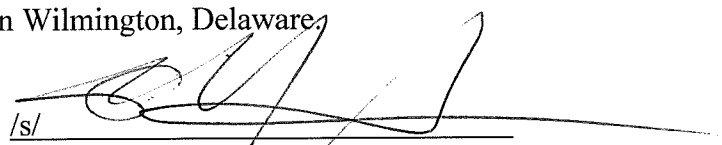

/s/
Travis S. Hunter (#5350)

EXHIBIT 1

Hunter, Travis S.

From: Bayliss, A. Thompson <bayliss@abramsbayliss.com>
Sent: Thursday, December 19, 2019 11:22 AM
To: Hunter, Travis S.; Sam Hirzel; Nachbar, Kenneth; Cumings, Alexandra
Cc: Moyer, Jeffrey L.; Cragg, Tyler E.
Subject: RE: Crystallex International Corporation v. Bolivarian Republic of Venezuela

Travis:

Thanks for reaching out about the anticipated motion. If you file it, the Republic intends to oppose the relief sought in the motion. We do not anticipate seeking an extension of the certiorari deadline. If you have any questions, please let me know.

Thanks,
Tom

A. Thompson Bayliss
Abrams & Bayliss LLP
20 Montchanin Road, Suite 200
Wilmington, DE 19807
direct: (302) 778-1033
cell: (302) 388-5138
fax: (302) 261-0292

From: Hunter, Travis S. <Hunter@RLF.com>
Sent: Wednesday, December 18, 2019 5:36 PM
To: Bayliss, A. Thompson <bayliss@abramsbayliss.com>; Sam Hirzel <shirzel@hegh.law>; Nachbar, Kenneth <KNachbar@MNAT.com>; Cumings, Alexandra <acumings@MNAT.com>
Cc: Moyer, Jeffrey L. <moyer@RLF.com>; Cragg, Tyler E. <Cragg@rlf.com>
Subject: Crystallex International Corporation v. Bolivarian Republic of Venezuela

Counsel,

We intend to file a motion to modify the stay. The motion will ask the Court (i) to require an answer the writ of attachment now; and (ii) to condition the stay on Venezuela/PDVSA filing their certiorari petition by January 21, or at the very least, with no extension of the certiorari deadline. Pursuant to Local Rule 7.1.1 please let me know if your clients consent or oppose the relief sought by noon tomorrow.

Best,

Travis S. Hunter
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Wilmington, DE 19801
(302) 651-7564 (direct)
(302) 584-3088 (cell)
hunter@rlf.com